

**KATHLEEN BLISS LAW PLLC**  
400 S. 4TH ST., SUITE 500  
LAS VEGAS, NEVADA 89101  
TEL: 702.793.4202 FAX: 702.793.4001

KATHLEEN BLISS, ESQ.  
Nevada Bar No. 7606  
kb@kathleenblisslaw.com  
JASON HICKS, ESQ.  
Nevada Bar No. 13149  
jh@kathleenblisslaw.com  
KATHLEEN BLISS LAW PLLC  
400 S. 4<sup>th</sup> St., Suite 500  
Las Vegas, Nevada 89101  
Telephone: 702.793.4202  
Facsimile: 702.793.4001

*Attorneys for Jeffrey Turino*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff;

vs.

JEFFREY TURINO,

Defendant.

CASE NO.: 2:09-cr-132-JAD

**STIPULATION AND PROPOSED  
ORDER TO CONTINUE SENTENCING**

**(Second request)**

Jeffrey Turino, by and through his counsel of record, Kathleen Bliss, Esq., of the law firm Kathleen Bliss Law PLLC; and the United States of America, by and through Assistant United States Attorney Kathryn C. Newman, hereby stipulate and request that the Court vacate Mr. Turino's sentencing hearing currently set for January 4, 2017, and continue it to a later time convenient with the Court, but not less than 60 days from the current setting. This stipulation is made and based upon the following:

1. On August 22, 2016, Mr. Turino entered a plea of guilty to the charge of Conspiracy to Commit Securities Fraud, in violation of 18 U.S.C. § 1349, as alleged in the Second Superseding Indictment.
2. Sentencing is currently set for January 4, 2017.
3. On December 21, 2016, this Court approved substitution of counsel (ECF No. 510), and undersigned counsel filed a designation of retained counsel on December 22,

**KATHLEEN BLISS LAW PLLC**  
 400 S. 4TH ST., SUITE 500  
 LAS VEGAS, NEVADA 89101  
 TEL: 702.793.4202 FAX: 702.793.4001

2016. (ECF No. 511).

4. Counsel has only recently obtained the presentencing report from Mr. Turino, but she has not had the opportunity to review it. Counsel has not obtained the file from prior counsel, Jess Marchese, but will make every effort to do so.
5. Mr. Turino is not in custody pending sentencing, and he does not object to this continuance.
6. Counsel for the United States stipulates to this continuance.
7. The additional time requested by this stipulation is reasonable pursuant to Fed.R.Crim.P. Rule 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not implicate or undermine the defendant’s speedy trial rights under the United States Constitution. *See Betterman v. Montana*, \_\_ U.S. \_\_, 136 S.Ct. 1609, 1617-1618 (2016).
8. This is the second request for a continuance of the sentencing. The additional time requested herein is not sought for purposes of delay.
9. Denial of this request for a continuance would deny counsel for Mr. Turino sufficient time to effectively and thoroughly prepare for sentencing, taking into account due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

Dated this 23rd day of December 2016.

/s/ Kathryn C. Newman  
 KATHRYN C. NEWMAN  
 Counsel for the United States

Kathleen Bliss  
 KATHLEEN BLISS  
 Counsel for Jeffrey Turino

**ORDER**

Based upon the stipulation of the parties, and good cause appearing, it is hereby ORDERED that Mr. Turino's sentencing hearing currently set for January 4, 2017, be, and the same hereby is, VACATED.

IT IS FURTHER ORDERED that the sentencing hearing is reset for March 6, 2017 at 11:00 a.m.

DATED this 27th day of December, 2016.



HONORABLE JENNIFER A. DORSEY  
UNITED STATES DISTRICT JUDGE

**KATHLEEN BLISS LAW PLLC**  
400 S. 4TH ST., SUITE 500  
LAS VEGAS, NEVADA 89101  
TEL: 702.793.4202 FAX: 702.793.4001